

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

Jared Goyette, et al.,
*On behalf of himself and other
similarly situated individuals,*

Court File No. _____

Plaintiffs,

v.

City of Minneapolis; Minneapolis
Chief of Police Medaria Arradondo *in
his individual and official capacity*;
Minneapolis Police Lieutenant Robert
Kroll, *in his individual and official
capacity*; Minnesota Department of
Public Safety Commissioner John
Harrington, *in his individual and
official capacity*; Minnesota State
Patrol Colonel Matthew Langer, *in his
individual and official capacity*; John
Does 1-2.

Defendants.

DECLARATION OF JARED GOYETTE

I, Jared Goyette, state as follows:

1. I am a resident of Minneapolis, MN. I work as a freelance journalist for various national and international news organizations. In the past I have worked

at WCCO Radio, the Sacramento Press, the Miami Herald, Public Radio International (PRI) and other news organizations.

2. On the evening of May 27, 2020, I was reporting on the protests arising out of the death of George Floyd and the related police response. I was reporting in the area around the 3rd precinct.

3. At or around 6 p.m. on May 27, a young male protester near me was hit in the head by a projectile fired by the police – likely a rubber bullet – and fell to the ground. He was writhing in pain. Other bystanders called 911 and tried to help him. No ambulance came. Several bystanders lifted him into a car and drove him away to take him to the hospital.

4. As I was documenting the young man being carried away, I was hit in the head with a projectile of some kind. It hit my nose and my left eye. I fell to the ground immediately in intense pain. Law enforcement gave no warnings or commands to withdraw before I was shot.

5. As I covered the protests, I was carrying a large camera with monopod for taking photos and video of the event, as well as a notebook and satchel. I was dressed in a dress shirt. I was not partaking in the protest, chanting, throwing anything. At the time of the incident, I was standing still, not moving toward the police. I was clearly recognizable as a member of the news media and away from

the general vicinity of where the protests were taking place. The street around me was not crowded.

6. After a second my head cleared, and I started to realize what had happened. A group of people rushed to treat me, bandaging my nose and eye area and helping me up. At that moment a tear gas canister landed nearby. My left eye-near where the projectile had hit was swelled shut. The tear gas made it impossible to see out of my other eye. I stumbled blindly to my feet. An older woman and some other individuals helped me to safety.

7. I went to the Open Cities Health Clinic for treatment. The doctor who examined me said I had been hit by a projectile traveling at high velocity. The doctor indicated that the pressure from swelling in my left eye was at a dangerous level, and I could have permanently lost my vision in 24-48 hours had I not sought treatment.

8. On the evening of May 30, I was reporting on the George Floyd protests again. A column of Minneapolis Police in riot gear walked down the street I was on. At the time, I was standing on the sidewalk. I shouted “press, press” loudly to ensure they knew I was authorized to be out after curfew. One officer, after hearing me shout “press, press” turned and pointed his weapon directly at me, apparently aiming at my head. He intended to intimidate me, and it worked. I was

scared. I have video of this incident, and on it you can hear me say “don’t point that [expletive] weapon at me.”

9. Later on the evening of May 30, I was walking with another journalist, Maggie Koerth. A car drove up with police in it. One of them rolled down the window. We identified ourselves as journalists, and this officer said “I want to fucking peg you” and drove off.

10. I intend to continue reporting on and documenting protests arising out of George Floyd and the practices of the Minneapolis Police Department. I have both a personal and professional interest in doing so. I believe I have a duty as a member of the press to document what is happening in my community, but it is also how I make my livelihood. The actions of the police to attack and intimidate me and other journalists not only impinges on my First Amendment rights, but also threatens my ability to make a living.

I declare under penalty of perjury under the laws of United States of America that the foregoing is true and correct.

Dated: June 2, 2020



Jared Goyette